



October 15, 2024

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Sean P. Carter

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RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Cozen O'Connor in response to the Court's Order at ECF No. 10421. That Order directed the PECs to provide certain information related to the anonymous letter concerning the deposition of Jonathan Marks, an expert for the WAMY defendants. I understand that Robert Haefele of Motley Rice will be submitting a separate letter for other members of the PECs and in response to the Court's directive to file an unredacted copy of the letter.

The anonymous letter was received in hard copy form on July 8, 2024, via U.S. mail. It was addressed to me at our firm's Philadelphia offices. The envelope did not include a return address. The postmark indicates that it was sent from Westchester, NY. A scanned copy of the envelope is enclosed as an attachment to this letter.

I do not know the identity of the author of the letter, and thus obviously have not had any subsequent communications with the author (whether written or oral; whether direct or indirect). I have spoken with all members of our 9/11 team, and the same is true for each of them. Cozen O'Connor has not undertaken any investigative efforts to identify the author, or to contact any of the third-party witnesses identified in the letter about the letter or allegations contained therein.

No member of Cozen O'Connor's 9/11 team who participated in the Marks deposition, or who had access to it, did anything to invite, encourage, or solicit the anonymous letter. It arrived completely out of the blue. Aside from the content of the letter itself and the postmark on the envelope, we are unaware of any other available information relevant to the identification of the author.

Respectfully submitted,

COZEN O'CONNOR

A handwritten signature in blue ink, appearing to read "Sean P. Carter".

SEAN P. CARTER

Honorable Sarah Netburn

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cc: All MDL Counsel of Record (via ECF)

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ATTACHMENT

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